

Muswell Hill Photographic Society
Data Protection and Privacy – Guidance to Officials and Members
Version 1.3 dated October 2020

MHPS Data Protection and Privacy Policy Implementation guidance for Officials and Members of MHPS

This document is to be read in connection with the MHPS Data Protection and Privacy Policy. It provides guidance to members as to how to manage any personal data they hold.

Explanation of the GDPR and Data Protection requirements – this section is not a legal interpretation of the relevant legislation. It is a brief summary of the main principles in place to help members understand our obligations and give context to the guidance contained in the remainder of the document.

The Club is required to publish a Data Protection and Privacy policy. We are also required to review and document our compliance with that policy on a regular basis.

Essentially we need to:

- 1 have a lawful basis for holding personal information*
- 2 have systems and controls in place to know how we collect and store such information*
- 3 control how personal data is transferred within (or outside the club) and know who has access to it*
- 4 destroy personal data when it is no longer reasonably needed ie we cannot hold onto it indefinitely*

This document details the systems and controls in place for us to meet our obligations under the relevant legislation.

Personal data is defined as: any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

In effect this means personal data is information that relates to an individual from which that individual can be identified either directly or indirectly.

The main types of personal data we hold includes: contact details (email, address, phone no etc); identity info embedded in EXIF data from image files; audio contributions and visual images on virtual meetings; and, computer account identity used in online meetings or social media.

1 Separation of personal data and different data controllers

1.1 Members may be involved with a number of different organisations (data controllers) which generate personal data. Personal data acquired via one data controller may not be used for the purposes of another data controller, or for a personal purpose.

Explanation: Any personal data acquired as a result of you acting on behalf of MHPS in a formal capacity must not be used for any purposes other than the fulfillment of your duties as a member of MHPS (in accordance with the MHPS Data Protection Policy) be that for another organisation for which you volunteer or for any personal or domestic purpose.

Eg. If you obtain personal data as a result of holding images on a personal pc whilst helping

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select images for an external competition, you cannot use those images for personal use, use for another organisation for who you work/volunteer or share them with others. Control of the personal data contained within the images is the responsibility of MHPS.

Eg. If members share images between themselves outside the formal Club nights (currently held on Wednesday evenings) as part of group work or to show images to each other, this is not done in a formal capacity on behalf of MHPS and as such it is up to the members to manage the handling of such images and personal data themselves. Control of the personal data contained within the images or personal data shared during an informal virtual online meeting (physical image, audio contribution and computer account identity) is NOT the responsibility of MHPS.

Eg. If you feel you need to share any images outside the club in association with club activities, contact the President (Charlotte) in the first instance and in advance of doing so.

2 Marketing

2.1 Members must never share members' personal data with third parties for marketing purposes.

2.2 If a member wishes to share marketing material within the club eg for an external talk, workshop, equipment etc this must be approved by a Committee member in advance, which in the first instance should be the Club Secretary, Daphne.

3 New members

3.1 The Membership Secretary (Javad) will give all new members a copy of the Data Protection and Privacy Policy and must obtain in writing the agreement of all new members to their personal data being managed in accordance with it and along the lines of:

***Please read** the attached MHPS Data Protection Policy which sets out the data we hold and how we use it.*

***Please reply to this email by XX** to confirm that you are happy for us to hold and use your data in accordance with the attached policy. You can send a simple reply saying 'yes I confirm I have read the attached policy and am in full agreement to it' or if you have issues with certain aspects you can reply 'yes subject to X,Y,Z (state what you are not happy with)'.*

In summary you agree to:

- 1 Your full contact details being held on the 'Full member contact list' held by Javad and Daphne. This is the restricted list.*
- 2 Whatever contact details you agreed with Javad being held on the 'Limited member contact list'. This is the list that gets distributed to all members to enable us to contact each other individually*
- 3 Your email address being contacted within this 'mhps-members@' email distribution list and thereby receiving the newsletter and other Club communications*
- 4 Your images (including your name) submitted to competitions, showtimes and set subject nights being loaded to the website from time to time*
- 5 Your name being displayed at club nights when the images you submit are presented and your images being held by the club*
- 6 Your image, audio contribution and computer account identity being shared during virtual online meetings and their recordings*
- 7 Your data being retained in accordance with the attached policy*

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3.2 The Membership Secretary should keep all confirmations from members and notify the President, Club Secretary and other relevant Officials such as the digital team if members wish for any exceptions to be made to the above policy with regards their own personal data.

4 Leavers

4.1 The Membership Secretary (Javad) will ask members leaving the club to delete/destroy the personal data of other MHPS members which they hold as a result of the formal activities of the Club. The Membership Secretary will ask the leaving member to confirm in writing (such as email) that they have done so and retain such confirmation. Personal data of other members held by a leaving member which was given in a personal capacity need not be deleted or destroyed.

Explanation: Members leaving the club should destroy any hard copy personal data held such as contact lists or delete any electronic copies of data held such as images and contact lists. If a leaver wishes to retain contact details to keep in touch with other members they should agree this with the member directly.

4.2 The Membership Secretary should inform the Website Manager, Club Secretary and President of leavers ideally via email asap.

4.3 The Membership Secretary should ask leavers who have held the position of Officers of MHPS to hand over all information and documentation (electronic or hard copy) relating to the Club when they leave. The Membership Secretary should ask the leaver to confirm they have deleted any electronic documentation held once handover is complete.

5 Contact lists

5.1 The Membership Secretary (Javad) is responsible for the management of the ‘full’ and ‘limited’ member contact lists. The Membership Secretary should keep both lists updated for new members and leavers on a timely basis and ensure that up to date limited contact lists are circulated as appropriate.

5.2 The Membership Secretary should agree the details to be contained within each of the above lists with new members when they join.

6 Email distribution list

6.1 The Membership Secretary (Javad) is responsible for the management of the email distribution list. The Membership Secretary should keep the list updated for new members and leavers on a timely basis.

7 Website

7.1 The Website Manager (Anwar) is responsible for the management of personal data contained within the website or website administration system. The Website Manager should only upload images from those members who have given permission for their images to be uploaded.

7.2 The Website Manager should remove any web account or gallery held by members who have left.

7.3 The Website Manager is responsible for managing copies of MHPS distribution list emails held centrally on the server. Such emails should be deleted on a regular basis (quarterly) and the Website Manager should confirm to the Club Secretary, Daphne that they

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have done so.

8 Images

8.1 Images for club nights are submitted to the digital team email address. The Website Manager is responsible for ensuring that the recipients of the digital team email address are only those individuals involved in the projection and processing of images. The recipients should be updated for additions and leavers to the digital team on a regular basis.

8.2 The digital team may use personal pcs to process images and thumb drives/ memory sticks to bring images to the club to upload onto the club laptop. Images should be stored by the digital team on the club laptop within the programme date structure set up.

8.3 On a regular basis (quarterly) the digital team should back up the images on the club's laptop.

8.4 On a regular basis (quarterly), and after the backup of the club laptop have been undertaken, all members of the digital team or recipients of the digital team emails if different should delete all images held on their personal computers or memory sticks. They should confirm to the Club Secretary, Daphne that they have done so.

8.5 If clubnight images are to be posted on the website, on a weekly basis the digital team member who was responsible for the club night should transfer to the Website Manager a file containing the images shown that Wednesday for uploading to the website. The file should exclude the images of any member who has asked that their images not be included on the website.

8.6 Images should only be retained for the previous two Programme years. Hence, on an annual basis in January the digital team should delete from the club laptop and the two backups on the external drives the images from three years earlier. Ie in January 2019, the images from 2016 should be deleted and in January 2020 the images from 2017 etc.

9 Newsletter

9.1 The Club Secretary is responsible for preparation and circulation of the weekly newsletter. The Club Secretary should ensure that the newsletter is only sent to current members of the Club.

9.2 If any personal data such as contact details or images are contained within the newsletter, the Club Secretary should ensure that the owners of the data have given permission for the data's use through their confirmation to the MHPS Data Protection and Privacy Policy. If the personal data is additional to that for which confirmation has already been given the Club Secretary should seek permission for its inclusion from the individual member in advance of its circulation.

10 MHPS Handbook

10.1 From time to time the Club may issue a handbook which may include a list of Club Officials. In such a case permission for such details should be sought in advance to the extent that permission has not already been granted through confirmation of agreement to the MHPS Data Protection and Privacy Policy.

11 External competitions

11.1 The External competition co-ordinator should ask members to notify them in advance of

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each external competition if they do not wish their images to be used for that event.

11.2 For external competitions necessitating MHPS to send images or other personal data such as author details to them, the External Competition co-ordinator should request a copy of the third parties Data Protection and Privacy Policy prior to assessing whether the club wishes to hand over such personal data. The External Competition co-ordinator should request that the third party only hold the personal data, including images for the event itself and request that they confirm that they have deleted the data after the event.

11.3 For external competitions held virtually online the External competition co-ordinator should check with the host whether the meeting is to be recorded, how long any such recording is to be held and with whom it will be shared. The External Competition co-ordinator should make members aware of the detail of any recording in advance so that members can make an informed decision whether to join the meeting.

11.4 If the co-ordination of images for an external competition requires images to be held on personal computers or external drives of members other than the digital team, such images should be deleted as soon as possible after the event and confirmation given by the External Competition co-ordinator via email to the Club Secretary.

12 Virtual online meetings

12.1 The club may hold virtual online meetings, including when unable to meet in person such as during the Covid 19 pandemic. On the occasions that such meetings are recorded the images, audio contributions and computer account identity of online meeting participants may be recorded and stored. Members should be made aware that a meeting will be recorded in advance and be able to opt out of a meeting if they do not wish their personal data to be recorded.

12.2 The Membership Secretary should warn new members that virtual online meetings may be recorded to enable them to make an informed decision whether to join the meeting. The programme team should warn external attendees (eg judges, speakers) in advance if the meeting will be recorded and seek their agreement to this. Before pressing record during a meeting the meeting host should warn attendees that the rest of the meeting is about to be recorded.

12.3 Where the recordings of such meetings are shared amongst members it must be done in a secure manner with the recording protected from being downloaded or embedded and a password. When the link is circulated within the club, members should be instructed not to share the password or link with non members.

12.4 The recordings of meetings should be removed from Vimeo (or equivalent) and deleted after one month, unless agreed otherwise by the Committee.

13 Data retention

13.1 Once a year the President should consider the general business and membership records held and delete the records held relating to the previous eighth year unless they constitute a historical record as set out in the MHPS Data protection and Privacy Policy. Ie in January 2019 documentation relating to 2011 should be deleted.

14 Review of MHPS Data protection and Privacy Policy

14.1 The President should ensure that the MHPS Data Protection and Privacy Policy is reviewed on a regular basis by the Committee and at least annually, potentially around the

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time of the AGM.

15 Subject Access or Erasure Requests

15.1 If a Subject Access or Erasure Request is submitted these should be forwarded to the Club Secretary in the first instance. The Club Secretary and President will decide how best to take such a request forward.

15.2 If a Subject Access Request is received the Club Secretary and President should consider including in the response a notification that the data requestor is entitled to make a Complaint to the Information Commissioner.

Members mentioned in the above:

All members – 1 and 2

Club Secretary – 2.2, 3.2, 4.2, 7.3, 8.4, 9.1, 9.2, 11.4, 15.1, 15.2

President – 1.1, 3.2, 4.2, 13.1, 14.1, 15.1, 15.2

Membership Secretary – 3.1, 3.2, 4.1-4.3, 5.1, 5.2, 6.1

Website Co-ordinator – 4.2, 7.1-7.3, 8.1, 8.5

Digital team – 3.2, 8.1-8.6, 11.4

External Competition Co-ordinator – 11.1–11.4